

## SOURLAND PLANNING COUNCIL

P.O. BOX 538  
NESHANIC, NJ 08853  
908-237-1652

October 9, 2003

New Jersey Board Of Public Utilities  
Two Gateway Center  
Newark, NJ 07102

Re: Comment on new rule  
Vegetation Management (Tree Trimming)

Dear Sir:

The Sourland Planning Council has a concern about the proposed rule. On page 3, paragraph 14:5-8.5(d) lists eight documents which were not available on your web site for ready inspection. Document 4 is environmental Stewardship Strategy for Electric Utility Rights-of-Way. Can you confirm that the inclusion of this document provides adequate environmental protection?

The issues of particular concern are:

1. Construction of access roads in wet lands which can alter drainage patterns and fill wet lands. All utility work should be subject to the DEP wet land rules.
2. Working in wet lands (especially vernal pools) can disrupt the breeding cycles of amphibians. Most breed in the spring. Trimming must be appropriately timed. The DEP Natural Heritage Program (609-984-0097) should approve of the timing of all work in wet lands.
3. Cutting trees in the spring can disrupt the breeding cycle of birds. Trimming must be appropriately timed. The DEP Natural Heritage Program (609-984-0097) should approve of the timing of all work in large contiguous forests such as the Highlands, the Great Swamp, Sourland Mountain and Pinelands.
4. Large contiguous forests need protection. Cutting away branches to the extent that the contiguous forest canopy is breached and open sky shows is very disruptive to the deep woods ecosystem. The additional sunlight allows invasive species to grow. Certain deep woods species will not live near a forest edge. Clearing a utility easement or road through the woods so sky shows deprives deep woods species of an area much larger than just the cleared area.

If you have any questions, please feel free to contact me.

Sincerely Yours,

Jerry Haimowitz, PE, DEE

Trustee Sourland Planning Council